PATENT Atty. Dkt. No. ROC920010284US1 MPS Ref. No.: IBMK10284

## REMARKS

This is intended as a full and complete response to the Office Action dated March 3, 2005, having a shortened statutory period for response set to expire on June 3, 2005. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-29 are pending in the application. Claims 1-6, 8-10, 12, 14-23, and 25-29 remain pending following entry of this response. Claims 1, 5-6, 10, 15, 21, and 27-29 have been amended. Claims 7, 11, 13 and 24 have been cancelled. Applicant submits that the amendments and new claims do not introduce new matter.

## Claim Rejections - 35 U.S.C. § 103

Claims 1-29 stand rejected under 35 US.C. 103(a) as being unpatentable over Ahlberg et al. (US. Patent Number 6,587,836), hereinafter referred to as Ahlberg, in view of Itabashi et al. (U.S. Patent Number 6,308,203), hereinafter referred to as Itabashi.

Applicant respectfully traverses this rejection.

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. See MPEP § 2142. To establish a *prima facie* case of obviousness three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP § 2143. The present rejection fails to establish at least the third criteria.

Ahlberg provides access and connectivity to a number of different legacy systems in one session using a unified and integrated Web-based system (Column 2, lines 16-40). As a result, Ahlberg discloses a web-based application system for

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processing system administrative and order entry functions for an integrated suite of services and products over the Internet (Column 3 Lines 14-31).

Itabashi directs to overcome the inconvenience of submitting personal information repeatedly when a user access two or more services (Column 1 20-42). As a result, Itabashi discloses an information processing method comprising storing personal information of a plurality of users and providing the personal information stored to an information processing device of the information provider on behalf of the user (Column 2 lines 14-24).

Regarding claim 1, the Examiner takes the position that "Ahlberg taught the invention substantially as claimed" and "it would be obvious to one of ordinary skill in the art to modify the method of Ahlberg with the teachings of Itabashi to associated at least a portion of the plurality of users with a plurality of products in order to purchase disparate products and services via a single security profile". Applicant respectfully disagrees. Ahlberg discloses a method of providing Internet enabled centralized authentication and entitlement administration services wherein entitlement is defined as "a privilege or authorization that a customer has" and "is akin to access levels in UNIX which are granted when a customer belongs to certain user groups" (Column 20 lines 55-63). However, in the present invention, entitlement services information refers to agreements related to products and includes maintenance agreements, services agreements and the like (Paragraph 0003). Therefore, Ahlberg does not disclose a method of providing entitlement services information for users. Thus, Ahlberg and the combination of Ahlberg and Itabashi, do not teach, show or suggest a method of providing entitlement services information to users, as recited in claim 1. Therefore, claim 1 is believed to be in condition for allowance.

Regarding claims 10 and 21, *Ahlberg* does not disclose an entitlement services system for the reasons given above with respect to the entitlement services information recitation of claim 1. Therefore, claims 10 and 21 are believed to be in condition for allowance.

Claims 7, 11, 13 and 24 have been cancelled. Claims 2-6, 8-9, 12, 14-20, 22-23, and 25-29, dependent upon claims 1, 10, and 21 respectively, are also believed to be in condition for allowance.

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Furthermore, the Examiner asserts that Ahlberg discloses an entitlement services system comprising at least one server hosting a plurality of applications each configured to issue requests to a common entitlement services information system for entitlement services information and each configured to pass the entitlement service information between one another in column 3 lines 14-37 and column 15 lines 34-52 (Paragraph 20). In fact, Ahlberg discloses a client/server structure wherein a StarOE server responses to StarOE clients configured to send "get StarOE security" requests to the StarOE server and the StarOE server returns racf id, an access level information, to the StarOE clients. However, Ahlberg does not teach having at least one server hosting a plurality of applications or having a plurality of applications each configured to pass entitlement services information between one another. Therefore, Ahlberg does not teach an entitlement services system comprising at least one server hosting a plurality of applications each configured to issue requests to a common entitlement services information system for entitlement services information and each configured to pass entitlement services information between one another.

For the reasons given above with respect to the entitlement services information recitation, Applicant submits that the rejection is improper and should be withdrawn. However, to further clarify the invention and move prosecution forward, Applicant has made amendments.

Therefore, Applicant submits that claims 1-6, 8-10, 12, 14-23, and 25-29 are in condition for allowance. Withdrawal of the rejection is respectfully requested.

## Conclusion

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicant's disclosure than the primary references cited in the office action. Therefore, Applicant believes that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

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Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted

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